STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION

October 15, 2013

VIA E-Mail

Joseph M. Driscoll
Midwest Green Energy, LLC.
P. O. Box 1514
Peoria, IL 61655
(309) 369-5686
(913) 523-9827 Fax
E-Mail: joe@midwestgreenenergy.com

Re: Docket No. 13-0567 Application for Certification as a Distributed Generation Installer

Dear Mr. Driscoll:

Enclosed please find Staff Data Requests AO 1.01 through AO 1.02 to Midwest Green Energy, LLC regarding the above-referenced docket. Please provide the responses to Staff's data requests using best efforts on or before October 30, 2013. Please note that individual responses should be provided as soon as they become available.

If you have any questions regarding these data requests, call me at (312) 814-6072

Sincerely,

Sanjo Omoniyi

AO

Enclosure

cc: Service List (Parties Only)

ILLINOIS COMMERCE COMMISSION

STAFF DATA REQUEST AO 1.01 through AO 1.02

Utility Company: Midwest Green Energy, LLC.

Regarding: **Docket No. 13-0567**: Docket No. 13-0567 Application for

Certification as a Distributed Generation Installer

Date Submitted: October 15, 2013

Staff of the Illinois Commerce Commission ("Staff") hereby submits Staff Data Requests AO 1.01 through AO 1.02 to Midwest Green Energy, LLC. Responses should be delivered using best efforts on or before October 30, 2013 ("Response Due Date"), in accordance with the instructions set forth below.

DEFINITIONS AND INSTRUCTIONS

- 1. "Relate to" or "refer to" shall mean, in addition to their customary and usual meaning, to reflect on, to pertain to, support, evidence, constitute, or mention.
- 2. "And" as well as "or "are to be construed either disjunctively or conjunctively so as to bring within the scope of this request any matters that might be construed outside its scope.
- 3. The terms "document" or "documents" are intended to be comprehensive, including without limitation any kind of written or graphic material, whether typed, handwritten, printed, computer-generated, or matter of any kind from which information can be derived, however produced, reproduced or stored on paper, cards, machines, tapes, film, electronic facsimile, disks, computer tapes, printouts, computer programs or computer storage devices or any other medium, of any nature whatsoever, including all originals, copies and drafts.
- 4. When asked to "identify" a person, provide that person's name, job title and last known business address.
- All documents requested herein are all those in the custody of, possession of, or control of the Company or its experts, consultants, agents, employees or representatives (including attorneys), or to which the Company or its experts, consultants, agents, employees or representatives (including attorneys) have access.
- 6. If any of the information requested in a data request cannot be furnished, please indicate what information is not being provided and the reason that it cannot be provided.

- 7. If the Company asserts any privilege as to any documents responsive to this request, it shall identify the author(s) of the document, the addressee(s), the recipients(s) of copies, the date of the document, the nature of the document (e.g., letter, memorandum, handwritten notes), the length of the document, the document's current location, and the specific reason(s) why the Company contends that the document is privileged or otherwise protected from discovery.
- 8. The response to each data request question should begin on a new page. As part of each response, please identify the data request question to which the response is made by typing it at the top of the page. In addition, each response should identify the name, job title and telephone number of the person or persons responsible for providing the information requested for each data request question. If any person so identified is not a witness in this proceeding, the response shall also identify the witness or witnesses who will be responsible for the answering of cross-examination questions pertaining to both the request and the response.
- 9. Documents provided as part of a response should be attached to the sheet containing the response. Each page of all documents provided in response to any data request question should be clearly marked with the data request question number, unless stapled together, in which case only the first page need be marked.
- 10. Please provide individual responses as they become available. If, in your responses to a data request, you make reference to written testimony or affidavits filed in this docket, please include page numbers and line numbers where the information sought by Staff in each question can be found.
- 11. Electronic responses rather than paper responses are preferred. If data is provided in response to a particular request, such data should be provided in an electronic format that allows data manipulation (i.e., spreadsheet preferably Microsoft Excel or database preferably Microsoft Access -- <u>not</u> .pdf). If a portion of a response needs to be provided in paper, please provide the entire response in paper and also provide electronically the portion that is able to be provided electronically. Responses shall be provided on or before the Response Due Date as follows:

Electronic responses shall be provided to the following persons:

Sanjo Omoniyi Illinois Commerce Commission somoniyi@icc.illinois.gov

If a paper response is required (i.e., where an electronic response cannot be provided), the paper response shall be provided to the following persons:

Sanjo Omoniyi Policy Analyst Illinois Commerce Commission 160 N. LaSalle, Suite C-800 Chicago, Illinois IL 60601-3104

- 12. The Company must seasonably supplement or amend any prior answer or response whenever new or additional information subsequently becomes known to the Company. The Company must also seasonably supplement any prior response to the extent of documents, objects or tangible things which subsequently come into the Company's possession or control or become known to the Company.
- 13. Due to the requirements regarding ex parte communications in the State Officials and Employees Ethics Act, 5 ILCS 430/5-50, please serve your responses to these data requests to all parties on the Service List for this Docket. Data request responses should not be served upon the Administrative Law Judges.

DATA REQUESTS

Questions

- AO 1.01 In paragraph 3 of the Affidavit, Exhibit A to the Application, Joseph M. Driscoll stated he has completed 14 Photovoltaic and 5 Wind Turbine installations which is more than the number of DG Installations required by Illinois Code Section16-128A of the Public Utilities Act ("Act") and 83 Ill. Adm. Code 468 ("Part 468").
 - 1. With respect to the Photovoltaic installations, did Joseph M. Driscoll complete the electrical wiring and connections necessary to interconnect the distributed generation facility with the electric utility's distribution system at the point of interconnection between the facility and the utility for at least five installations? If no, then please identify the person or persons that performed this work.

Yes

- 2. If the answer to (1) is yes, please provide a general description of at least five of the photovoltaic installations. Please include in the response a general descriptions of the equipment involved in the installations and where and when those installations were completed.
 - 8 Solarworld modules with Xantrex 3.3 kW inverter into 100 amp single square D 20amp double pole backfeed Breaker – installation 09/2006 Metamora, IL (Ameren)
 - ii. 10 Solarworld modules with Xantrex 3.3 kW inverter into 200 amp single phase square D 20amp double pole backfeed breaker installation 03/2007 Metamora, IL (Ameren)
 - iii. 6 Solarworld modules with Xantrex 3.3 kW inverter into 225 amp three phase square D 20amp double pole backfeed Breaker installation 06/2008 Metamora, IL (Ameren)
 - 14 Solarworld modules with Xantrex 3.3 kW inverter into 200 amp single phase square D 20amp double pole backfeed breaker – installation 09/2009 Eureka, IL (Ameren)
 - v. 11 Solarworld modules with Fronius 2.4 kW inverter into 100 amp single phase square D 20amp double pole backfeed breaker installation 12/2010 Germantown Hill, IL (Ameren)
 - vi. 42 Astronergy modules with Enphase 215w micro-inverter into 400 amp square D 60amp double pole backfeed breaker installation 09/2012 El Paso, IL (Corn Belt)
 - vii. 20 Astronergy modules with Fronius 5.0 kW inverter into 200 amp single phase square D 20 amp double pole backfeed breaker installation 11/2012 Washington, IL (Ameren)
 - viii. 5 Astronergy modules with Enphase 215w micro-inverter into 225 amp 3 phase service 20 amp three pole backfeed breaker. 225 amp buss is feed with 150 amp utility power, installation 10/2012 Peoria, IL (Ameren)
 - ix. 5 Solarworld modules with Froniuis 2.0 kW inverter into 225 amp 3 phase service using 20 amp double pole backfeed breaker. 225 amp buss is feed with 150 amp utility power, installation Table Grove, IL (Ameren)

- x. 64 Sanyo modules with Solectria 13 kW inverter into 400 amp 3 phase service with 40 amp backfeed breaker. 400 amp buss is feed with 200 amp utility power, installation 7/2010 Metamora, IL (Ameren)
- xi. 80 Sanyo modules with Solectria 30 kW (consolidated inverters above installation and this to common inverter) into 400 amp 3 phase service with 90 amp backfeed breaker. 400 amp buss is feed with 200 amp utility power, installation 5/2011 Metamora, IL (Ameren)
- xii. 48 Sanyo modules with Solectria 13 kW (repurposed from 7/2010 installation) inverter into 400 amp 3 phase service with 40 amp backfeed breaker. 400 amp buss is feed with 200 amp utility power, installation 3/2012 Metamora, IL (Ameren)
- xiii. 2 REC modules with Enphase 240w micro-inverter into 200 amp 3 phase service with 20 amp backfeed breaker installation 02/2010 Wonder Lake, IL
- xiv. 64 Sanyo modules with Solectria 15 kW inverter into 200 amp 3 phase service with 50 amp backfeed breaker. 400 amp buss is feed with 200 amp utility power, installation 12/2009 Effingham IL (Corn Belt)
- 3. With respect to the Wind Turbine installations, did Joseph M. Driscoll complete the electrical wiring and connections necessary to interconnect the distributed generation facility with the electric utility's distribution system at the point of interconnection between the facility and the utility for the five installations? If no, then please identify the person or persons that performed this work.
 - Burford Electric, Tetopolis, IL did the final electrical hookup of the (1 of 2) 12 kW wind turbines MGE installed.
 - Carey Electric Contracting McHenry, IL did the final electrical hookup of 1 1kW Windterra vertical Axis Turbine MGE installed.
 - Chevron Energy Solutions Company handled the contracting with local electrical contractor Wonder Lake, IL who did the final electrical hookup of 1 - 1kW Windterra vertical Axis Turbine MGE installed.
 - 1kW Windterra vertical Axis Turbine with Windterra proprietary inverter connected to a 20amp double pole breaker, Metamora, IL (Ameren)
 - V. Burford Electric, Tetopolis, IL did the final electrical hookup of the (2 of 2) 12 kW wind turbines MGE installed.
- 4. If the answer to (3) is yes, please provide a general description of the Wind Turbine installations. Please include in the response a general description of the equipment involved in the installations and where and when those installations were completed
 - i. 1 1kW Windterra vertical Axis Turbine with Windterra proprietary inverter connected to a 20amp double pole breaker, Metamora, IL (Ameren)

- AO 1.02 In paragraph 3 of the Affidavit, Exhibit A to the Application, David F. Driscoll stated he has completed 14 Photovoltaic and 5 Wind Turbine installations which is more than the number of DG Installations required by Illinois Code Section16-128A of the Public Utilities Act ("Act") and 83 III. Adm. Code 468 ("Part 468").
 - 1. With respect to the Photovoltaic installations, did David F. Driscoll complete the electrical wiring and connections necessary to interconnect the distributed generation facility with the electric utility's distribution system at the point of interconnection between the facility and the utility for at least five installations? If no, then please identify the person or persons that performed this work.

Yes

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- xiv. 64 Sanyo modules with Solectria 15 kW inverter into 200 amp 3 phase service with 50 amp backfeed breaker. 400 amp buss is feed with 200 amp utility power, installation 12/2009 Effingham IL (Corn Belt)
- 3. With respect to the Wind Turbine installations, did David F. Driscoll complete the electrical wiring and connections necessary to interconnect the distributed generation facility with the electric utility's distribution system at the point of interconnection between the facility and the utility for the five installations? If no, then please identify the person or persons that performed this work.
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- 4. If the answer to (3) is yes, please provide a general description of the Wind Turbine installations. Please include in the response a general description of the equipment involved in the installations and where and when those installations were completed

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